



Alaska Native Tribal Health Consortium

CODE OF CONDUCT

February 2009

**Approved by ANTHC Board July 2000
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I. INTRODUCTION

Message from the CEO

The Alaska Native Tribal Health Consortium (ANTHC) has a reputation for providing world class, quality service. This reputation has earned ANTHC the respect and trust of our patients/clients, families, employees and the community at large. We are committed to meeting healthcare needs while conducting our business activities in full compliance with all federal, state and local laws and regulations.

We have worked together to develop a Code of Conduct and Corporate Compliance Program for ANTHC. The Compliance Program embodies ANTHC's commitment to the highest professional standards. The Code and Program are intended to guide and direct all employees, officers, Board members and others who work at or are associated with ANTHC in dealing with situations you may encounter here.

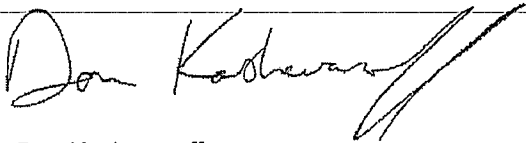
The Code and the Compliance Program provide assistance to us in making right choices when confronted with difficult decisions. We all should read the Code carefully and completely, raising any questions with our supervisor or manager. You have our personal pledge that there will be no retaliation for good faith reporting of potential compliance issues. We all have a personal obligation to uphold the standards described in the Code of Conduct.

If any part of the Code of Conduct is unclear to you, or if you have questions or concerns about a situation you are facing, there are a number of ways to seek assistance. First, we hope you will feel comfortable discussing your question or concern with your supervisor. If for any reason you do not wish to do so, or your supervisor is not able to address your question or concern, you may contact the Human Resources Department. If these resources are either not available or do not provide you with adequate answers, you can also contact the Office of Compliance at 729-1992. As a last resort, you can contact the Employee Compliance Hotline where your call will be kept anonymous if you so desire.

You may reach the Employee Hotline at 1-877-772-6743. Be assured that no retaliatory action will be taken against you for reporting a compliance problem or concern in good faith either to the hotline or through any other ANTHC channel.

As you can see, managers and supervisors have a special responsibility as part of the Compliance Program. Our management team continues to maintain an open door policy and is ready and willing to listen to any and all concerns, questions or suggestions that you may have regarding this Code of Conduct, the Compliance Program or any issue. Thank you for your hard work and dedication.

Sincerely,



Don Kashevaroff
Chief Executive Officer

Alaska Native Tribal Health Consortium Vision, Mission, Core Values

Vision: Alaska Natives are the healthiest people in the world.

Mission: Providing the highest quality health services in partnership with our people and the Alaska Tribal Health System.

Core Values:

Achieving Excellence

Native Self-determination

Treat with respect & integrity

Health & wellness

Compassion

Foreword

This Code of Conduct has been developed with employee input from all levels of our organization and has been approved by the Alaska Native Tribal Health Consortium Board of Directors. The Code reflects our Mission, Vision and Core Values and helps to ensure that we, the employees of ANTHC, have a clear understanding of the business, professional and personal ethics that are expected of us in the workplace. It applies equally to everyone, while serving as a board member, while employed at ANTHC, or doing business with or on behalf of ANTHC.

The information contained in this Code is to be used as a resource to help guide each of us in handling both routine and unusual situations we may encounter in our daily activities. Other resources are available to answer specific technical questions and concerns, such as policies and procedures, our supervisor, Human Resources, the Corporate Compliance Officer and the Employee Hotline. Whenever we have a question or concern regarding a workplace issue or potential practice, we should always try to raise this issue through the existing chain of command within our department. If more assistance is needed, questions can continue to be raised up through the chain of command to our supervisor's manager or the personnel department. Employees are encouraged to use the chain of command whenever possible. Through the compliance program, two additional resources have also been created for employees; employees can contact the office of compliance or contact the compliance hotline anonymously.

II. STANDARDS

A. Quality of Care

- ◆ Our fundamental purpose is to provide excellent care. In pursuit of that goal, we strive for clinical and technical excellence, treat our patients/clients with dignity, respect their rights to privacy and confidentiality, and respond to their needs promptly and courteously.
- ◆ We accept patients/clients for medically/clinically indicated treatment that is within our scope of services.
- ◆ We ensure that any patients/clients being transferred to another facility have received complete information and explanation concerning the need for the transfer, and alternatives prior to transfer. A patient/client will be referred to another facility only when we believe that facility will provide care appropriate to the patient/client's needs.
- ◆ We provide emergency care without regard for the patients/clients' ability to pay or source of payment.
- ◆ We ensure that only personnel who have proper credentials and who have demonstrated competency are involved in caring for our patients/clients. We respect and protect the integrity of clinical decision making regardless of the method used to compensate or share financial risk with voluntary and/or salaried physicians, clinicians, managers, executives and other staff.
- ◆ We maintain medical and client records that reflect complete and accurate accounts of all care and treatment provided to patients/clients.
- ◆ We provide medical services that are appropriate, safe and in compliance with all applicable laws, regulations and professional standards.
- ◆ We honor the right of patients/clients to receive information regarding our policies, procedures, charges and the health professionals who care for them.

- ◆ We report all errors and concerns to the appropriate individuals.

B. Confidentiality

- ◆ We respect the privacy of our patients/clients and colleagues. We recognize we have access to the information of others on a "need to know" basis only.
- ◆ We do not reveal medical, clinical or business information unless such release is supported by a legitimate clinical or business purpose, patient/client request, or court or agency order and is in compliance with applicable laws, rules, and regulations, as well as our policies and procedures.
- ◆ We do not discuss patient/client information in any public area, including elevators, hallways, rest rooms, lobbies or dining areas.
- ◆ We exercise care to ensure that confidential and proprietary information is carefully maintained and managed to protect its value.
- ◆ We do not disclose information regarding ANTHC's financial performance without appropriate approval.
- ◆ We treat individual salary, benefits, payroll, personnel files, and information on disciplinary matters as confidential information.

C. Compliance with Laws and Regulations

- ◆ Our actions reflect our commitment to conduct all of our activities at ANTHC in an honest, ethical and professional manner in compliance with state, federal, and local laws as well as our policies.
- ◆ We do not solicit, receive, give or offer anything of value to physicians or other health care providers for the referral of patients/clients or services. We strictly prohibit kickbacks, bribes, rebates or any kind of benefits intended to induce referrals.
- ◆ We compensate health care professionals and other providers fairly. Where compensation is on a per-service or per-patient basis, we pay only for services actually provided and documented.
- ◆ We never engage in any business activity that we believe is unethical or illegal.
- ◆ We do not discuss pricing with our competitors, or otherwise engage in activities that violate laws concerning restraint of trade and fair business practices. ANTHC may give preference to Alaska Native and American Indian individuals and organizations in awarding contracts and grants as permitted or required by law and ANTHC's policies.
- ◆ We are truthful and straightforward in our advertising, fund raising and marketing activities. We ensure that all communications, disclosures of information, and data are clear, accurate, and complete, to avoid misleading statements.
- ◆ We do not make false or misleading statements to any government agency, health care program or payer source.
- ◆ We are responsive to inquiries by government auditors, investigators, or other officials and we maintain a spirit of cooperation in our dealings with them.

D. Billing and Coding

- ◆ We bill only for services that are provided for and fully documented in our patients'/clients' medical records.
- ◆ We prepare and maintain all billing records accurately, honestly, and in accordance with established finance and accounting practices.
- ◆ We use billing codes that accurately describe our services. We strictly prohibit improper coding or bundling/unbundling charges to increase reimbursement.
- ◆ We do not bill for outpatient services that are included in the reimbursement for a patient's inpatient care.
- ◆ We bill appropriately for patients who are transferred to another hospital rather than discharged.
- ◆ We record all financial information in accordance with generally accepted accounting principles, established finance procedures and internal controls.
- ◆ We submit claims in a timely manner and only for services that we believe are medically necessary.
- ◆ We will notify payers of improper charges and credit balances, and refund monies promptly and in accordance with established procedures, rules and regulations.
- ◆ We waive co-payments and deductibles only for patients/clients who are IHS beneficiaries or who are otherwise entitled, by law or contract, to receive our services at no charge. We do not otherwise provide any benefits to patients/clients in return for their admission or continued treatment.
- ◆ We store records in a safe and secure location for the period of time required by law. We organize our records to permit prompt retrieval and dispose of them in accordance with an established retention policy.
- ◆ We promptly report any questions or errors to our supervisor or manager.

E. Conflicts of Interest

- ◆ We will diligently guard against the appearance of impropriety or conflict of interest, and will disclose in advance any potential conflicts of interest to our supervisor or Compliance Office for review.
- ◆ We promote ANTHC's best interests in all of our activities.
- ◆ We recognize the rights of employees to engage in personal activities outside of employment, which do not interfere with work. Such activities, whether compensated or not, shall not conflict with, undermine, or compete with ANTHC's interests. We disclose all such activities to our supervisor before such conflicts occur.
- ◆ We do not seek or accept cash, gifts, tips, or favors of substantial value provided in connection with our employment. Substantial value is defined in our policies and procedures. If we have a question as to the appropriateness of a gift, we seek approval from our manager or the Office of Corporate Compliance.

- ◆ We do not conduct outside work during regular office hours and we do not use ANTHC facilities, equipment, labor or supplies to conduct any outside employment activity.
- ◆ We provide preference to Alaska Native and American Indian individuals and organizations in awarding contracts and grants as permitted or required by law and ANTHC policies.
- ◆ We disclose any supervisory or reporting relationships we have with relatives (e.g., spouse, children, parents, or siblings) to our supervisor or manager in a timely manner.

F. ANTHC Assets

- ◆ We are responsible and accountable for the proper use of all ANTHC property and equipment entrusted to our care.
- ◆ We follow established internal control procedures in handling and recording and disposing of all ANTHC funds, property and equipment.
- ◆ We respect and protect the intellectual property rights of individuals and companies with which we do business. We follow applicable copyright, patent, trademark, and marketing laws and license agreements when we use this property, including computer software and printed publications. We do not copy company computer software unless it is specifically allowed in the license agreement.
- ◆ We use ANTHC property appropriately and take measures to prevent any unexpected loss of equipment, supplies, materials or services. We are aware that managers must approve any personal use of company provided equipment, supplies, materials or services.
- ◆ We report time and attendance accurately and will work productively while on duty.
- ◆ We avoid receiving any personal financial gain as a result of business travel or entertainment. We incur travel and entertainment expenses only to the extent they are consistent with our job responsibilities and the organization's needs and policies and procedures.
- ◆ We adhere to established policies and procedures governing record management and comply with the record retention and destruction policies/schedules for our departments.

G. Health and Safety

- ◆ We take all reasonable precautions to ensure the safety of our patients/clients, visitors, and employees.
- ◆ We follow all applicable laws and safety practices.
- ◆ We handle and dispose of hazardous materials and waste in accordance with all applicable laws and regulations.
- ◆ We comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land.
- ◆ We are responsible for becoming familiar with and following emergency and safety plans and procedures.
- ◆ We maintain a workplace that is free of violence. We do not bring weapons of any kind to ANTHC facilities. We understand that only on-duty law enforcement officers are allowed to carry weapons on ANTHC premises.

- ◆ We recognize that ANTHC is a drug-free work place. We do not tolerate the illegal use, sale, distribution, or possession of alcohol or illegal drug or chemical substances on ANTHC premises. We limit access to controlled substances to persons who are properly licensed or have express authority to handle or receive them.
- ◆ We report any possible violation of the organization's safety policies and procedures, laws, regulations or standards to the manager or supervisor of the worksite. We also report concerns about inappropriate and potentially disruptive behavior. If we are not satisfied that the issue has been addressed we will notify our supervisor, the Safety Office or the Office of Corporate Compliance.

H. Human Resources

- ◆ We maintain a work environment that respects the rights and dignity of our fellow employees, regardless of their position within ANTHC.
- ◆ We avoid inappropriate and potentially disruptive behavior and we work cooperatively through our supervisor, Human Resources Office or Corporate Compliance Office to resolve concerns about our own behavior and concerns we have about the behavior of others.
- ◆ We will not tolerate any form of threatening or abusive behavior, sexual or other forms of harassment or discrimination.
- ◆ We apply Indian Preference in employment as authorized by law, in accordance with the policies of the employing organization, ANTHC. Subject to these Indian Preference policies, we comply with all applicable federal, state, and municipal laws prohibiting unlawful discrimination in employment and training.
- ◆ We provide communication channels and dispute resolution programs that allow employees to address concerns about compliance or ethical questions and concerns, and behavior standards without fear of retaliation.
- ◆ We conduct regular training and education so that employees can understand and follow the laws, regulations, policies and professional standards that apply to their jobs.
- ◆ We inform all employees of their duties and responsibilities, and provide timely feedback about their performance.
- ◆ We screen prospective employees to assure that they have not been sanctioned by any applicable regulatory agency and are eligible to perform their designated responsibilities.
- ◆ We are aware that every manager is responsible for creating a work environment in which compliance or ethical concerns can be raised about compliance, ethical, behavioral and other issues. If an employee raises a compliance or ethical question or concern, the manager must address it. If a manager does not know how to respond, he or she should seek assistance through the chain of command, Human Resources or the Office of Corporate Compliance.
- ◆ We familiarize ourselves and comply with the contents of ANTHC's Employee Handbook, as well as with the policies and procedures applicable to our employment and responsibilities at ANTHC.

III. EMPLOYEE RESPONSIBILITIES

- ◆ Employees, regardless of their position or employment status, are expected to become familiar, and act in accordance, with this Code of Conduct, and the laws and regulations that affect the performance of their jobs.
- ◆ We encourage employees who have questions about the Code of Conduct, a law or regulation, behavior standards, or any ANTHC policy or practice, to talk to their supervisors, another member of management, their Human Resources Office, or the Corporate Compliance Officer.
- ◆ We have an affirmative duty to immediately report violations of this Code of Conduct or of any law or regulation to our supervisor or another member of management. Unprofessional, inappropriate and disruptive behavior should also be reported promptly. Most situations can be resolved at this level. If a question or concern cannot be resolved through these established channels, employees should report the matter to the Corporate Compliance Officer, either directly or through the Employee Hotline. Failure to report a known violation or reasonable suspicions may subject an employee to disciplinary action and legal liability.

IV. ENFORCEMENT

Non-Retaliation

- ◆ No disciplinary action or other types of retaliation will be taken against any employee who, in good faith, reports a concern, issue, problem, or violation of law, regulation or the Code of Conduct to management, Human Resources, the Corporate Compliance Officer or the Employee Hotline.
- ◆ "Good faith" does not mean that you have definitive proof, but that you have objective reason(s) for the allegation.
- ◆ Any employee who believes that he or she has suffered retaliation for making a report should contact the Corporate Compliance Officer or call the Employee Hotline.
- ◆ ANTHC is also committed to protecting employees from the intentional misuse of the Employee Hotline. Deliberately making a false accusation is a serious violation of ANTHC policy and may lead to disciplinary action, up to and including termination of employment.

Reporting Concerns

- ◆ Frequently, we are confronted with situations that we do not know how to handle. Here are some questions to consider when confronted with these situations:
 - ◆ Does the action comply with ANTHC policy? Is the action legal?
 - ◆ How would the action appear if disclosed to the public?
 - ◆ Does the action give the appearance of wrongdoing?
 - ◆ Can I defend my action to my superiors?
 - ◆ Does the action agree with the ANTHC Code of Conduct?

- ◆ The leadership and management team is committed to assisting you find the answer to these questions. Every employee is required to report all possible violations of law or ethical standards, including concerns about potential fraud, waste and abuse, through the chain of command, Human Resources or the Corporate Compliance Office.
- ◆ Concerns about patient safety and quality of care should be promptly reported to your supervisor, the risk manager, the Service Chief, the Chief Medical and Quality Officer, or through other established reporting channels. These reports must be made whether or not there is a potential violation applicable laws, regulations or standards.
- ◆ If any part of this Code of Conduct is unclear, or if you have questions or concerns about a situation you are facing, you should always first attempt to discuss your questions or concerns with your supervisor. If for any reason you do not wish to do so, or your supervisor is not able to address the question or concern, you may contact Human Resources or the Corporate Compliance Office.

Compliance Hotline

- ◆ As a last resort, the toll-free Compliance Hotline has been made available to employees who have a question or concern and don't feel comfortable discussing the matter with their supervisors or other management representatives. Trained personnel answer calls to the Compliance Hotline 24 hours a day, seven days a week. Calls are not recorded and reports will be kept anonymous to the extent permitted by law.
- ◆ Information from Hotline calls will be communicated to ANTHC's Corporate Compliance Officer for examination and response. Requests for information or action will be handled promptly, discreetly and professionally. All reports of improper conduct will be investigated.
- ◆ Employees may choose to identify themselves or make an anonymous report to the Employee Hotline. However, if any employee tells others (i.e., co-workers, friends, etc.) about their call, anonymity cannot be guaranteed.
- ◆ Employees who call the Hotline can arrange to make a follow-up call to learn what action was taken on their report.
- ◆ To reach the Employee Hotline, call 1-877-772-6743. It is available 24 hours a day, seven days a week.

Approved by ANTHC Board - July, 2000

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